

Jared Snyder  
18-7-5

**Talking points for Jared Snyder  
California Air Resources Board Hearing  
September 28, 2018**

*Introduce myself*

Thank you for providing us the opportunity to testify today. New York State strongly supports the ~~Resource's Board plan~~ <sup>proposed</sup> to clarify the "deemed to comply" provision. Compliance with the significantly weakened and, we believe, unlawful federal emission standards cannot be deemed to comply with the more protective CARB standards – standards that have been adopted by New York and the other Section 177 states and are essential to protect our citizens from the threat of climate change. <sup>stuff proposed</sup>

Since experiencing the devastation of Superstorm Sandy first hand nearly six years ago, Governor Cuomo has made reducing the pollution that is causing climate change a priority.

In New York:

- Severe weather events are now the norm and disastrous; significant flooding from storms occurs at alarming frequency; sea levels are projected to rise up to 6 feet by 2100, which would make flooding of NY's tidal areas routine.
- <sup>change</sup> Climate <sup>substantial</sup> also has public health effects- we just completed an ozone season where all monitors in the NYC metro area show non-attainment with the ozone standard, half of which show exceedance of the 2008 standard.
- <sup>- a particularly hot day -</sup> On July 2nd, we experienced ozone levels in the lower Hudson Valley that were the highest seen in the past decade – levels that are "very unhealthy" for the general public, according to EPA's own rating system [ $>200$  on Air Quality Index].

At Governor Cuomo's direction, NY is committed to fighting the ~~effects and~~ cause of climate change through a comprehensive strategy that is designed to reduce greenhouse gas emissions and bolster clean renewable energy development.

- Together with the other 15 states in the US Climate Alliance, NY has committed to the principles of the Paris Accord.
- We have adopted ambitious GHG reduction goals of 40% reduction by 2030, and 80% by 2050
- We have made multibillion dollar investments in solar energy, poured millions into geothermal and energy efficiency, and we are poised to develop the largest offshore wind farm off the East Coast.

Transportation is New York's largest GHG sector, <sup>has grown</sup> and it's growing: 23% <sup>Transportation emissions grew</sup> emissions increase between 1990 and 2014. We've started to bend that curve with cleaner cars but much more is needed – and will be impossible without strict vehicle emission standards, including the zero emission vehicle mandate.

To ensure that consumers find electric vehicles attractive, we have invested and continue to invest extensively in electric vehicle infrastructure.

- \$250 million Evolve NY
- Charge NY 2.0: from 2K to 10K chargers by 2021
- Proceedings of the Public Service Commission are getting utilities in the game.

DEC and NYSEERDA provide tens of millions of dollars in EV rebates to municipalities and consumers, respectively. These programs have contributed to a 67% increase in the number of electric vehicles sold from 2016 to 2017.

We just announced that \$128 million Volkswagen Mitigation Trust proceeds will be invested to help transform our transportation network, leaning heavily on electrification.

We are long term partners with California in working to advance motor vehicle standards and emissions.

- We have supported harmonized national standards for GHG emissions because it spreads the benefits across the country to all motor vehicle purchasers, provides regulatory stability and predictability to industry, and ensures that visitors and residents alike are contributing to the solution.
- But now, due to a Federal proposal that that will increase petroleum consumption and the profits of oil companies, we support the staff proposal to clarify the Deemed to Comply provision. The California regulatory program has always been technology forcing, and the federal proposal is a giant leap backwards.
- We also support continued dialog with industry and the federal regulators to explore whether a meaningful harmonized standard can be implemented.

The authority for California to adopt these regulatory programs is clear in Section 209 of the Clean Air Act. And by extension the authority for section 177 states to adopt is also clear. That authority is a critical component of New York's effort to address not only greenhouse gases, but also criteria pollutants and their precursors. Indeed, California initially adopted the electric vehicle mandate to reduce criteria pollutants, not GHGs. And New York initially adopted it for the same reason.

When the Board finalizes this action, we will commence a rulemaking to adopt it in New York as expeditiously as possible.

And when the time comes, New York <sup>will be</sup> prepared to sue the Federal Government for its illegal, irresponsible and immoral regulatory action, which is nothing more than a thinly veiled giveaway to the fossil fuel industry.

While the current administration may want to reverse the progress we've made to reduce climate pollution, New York will continue to protect our communities and the environment.